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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11 (Lead Case) (Jointly Administered)

**REQUEST FOR ENTRY OF ORDER BY DEFAULT
GRANTING APPLICATION OF DEBTORS
PURSUANT TO 11 U.S.C. § 327(e), FED. R. BANKR.
P. 2014(a) AND 2016, AND THE ORDER
AUTHORIZING THE DEBTORS TO EMPLOY
PROFESSIONALS USED IN THE ORDINARY
COURSE OF BUSINESS FOR AUTHORITY TO
RETAIN AND EMPLOY COVINGTON & BURLING
LLP AS SPECIAL COUNSEL FOR THE DEBTORS
EFFECTIVE JANUARY 1, 2020**

Date: April 14, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: April 7, 2020, 4:00 p.m. (PT)

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the
3 “**Utility**”), as debtors and debtors in possession (collectively, “**PG&E**” or the “**Debtors**”) in the above-
4 captioned chapter 11 cases (the “**Chapter 11 Cases**”), hereby request, pursuant to Rule 9014-1(b)(4) of
5 the Bankruptcy Local Rules for the United States District Court for the Northern District of California,
6 as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain*
7 *Notice and Case Management Procedures* entered on May 14, 2019 [Dkt No. 1996] (“**Case**
8 **Management Order**”), that the Court enter an order by default on the *Application of Debtors Pursuant*
9 *to 11 U.S.C. § 327(e), Fed. R. Bankr. P. 2014(a) and 2016, and the Order Authorizing the Debtors to*
10 *Employ Professionals Used in the Ordinary Course of Business for Authority to Retain and Employ*
11 *Covington & Burling LLP as Special Counsel for the Debtors Effective January 1, 2020* filed by the
12 Debtors on March 24, 2020 [Dkt. No. 6462] (the “**Application**”).

13 **RELIEF REQUESTED IN THE APPLICATION**

14 The Application seeks entry of an order approving the retention of Covington & Burling
15 LLP (“**Covington**”), as the Debtors’ special counsel, pursuant to section 327(e) of the Bankruptcy Code,
16 to represent the Debtors in connection with the Special Matters described therein, on the terms and
17 conditions in accordance with Covington’s hourly rates and reimbursement policies applicable to the
18 Debtors, as set forth in the Application and Goodwin Declaration.

19 A proposed order (the “**Proposed Order**”) was attached as **Exhibit A** to the Application.
20 The order being submitted is different from the Proposed Order attached to the Application in that the
21 reference to a hearing being held has been deleted.

22 **NOTICE AND SERVICE**

23 A *Notice of Hearing on Application of Debtors Pursuant to 11 U.S.C. § 327(e), Fed. R.*
24 *Bankr. P. 2014(a) and 2016, and the Order Authorizing the Debtors to Employ Professionals Used in*
25 *the Ordinary Course of Business for Authority to Retain and Covington & Burling LLP as Special*
26 *Counsel for the Debtors Effective as of January 1, 2020* [Dkt. No. 6465] (the “**Notice of Hearing**”) was
27 filed on March 24, 2020. The Application, the supporting declarations of David B. Goodwin and Janet
28 Loduca, and the Notice of Hearing were served as described in the Certificate of Service of Alan B.

1 Francoeur filed on March 27, 2020 [Dkt. No. 6508]. The deadline to file responses or oppositions to the
2 Application has passed, and no responses or oppositions have been filed with the Court or received by
3 counsel for the Debtors.

4 **DECLARATION OF NO RESPONSE RECEIVED**

5 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury,
6 that:

7 1. I am an attorney with the firm of Keller Benvenuti Kim LLP, co-counsel for the
8 Debtors.

9 2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined
10 that no response or opposition has been filed with respect to the Application.

11 3. This declaration was executed in San Francisco, California.

12 WHEREFORE, the Debtors hereby request entry of the Proposed Order substantially in
13 the form attached to the Application, granting the Application as set forth therein.

14
15 Dated: April 8, 2020

16 **WEIL, GOTSHAL & MANGES LLP**
17 **KELLER BENVENUTTI KIM LLP**

18 /s/ Thomas B. Rupp

19 Thomas B. Rupp

20 *Attorneys for Debtors and Debtors in Possession*
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